

EXHIBIT “A”

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA DIVISION**

ECOLAB INC., and NALCO COMPANY,
LLC d/b/a Nalco Water, an Ecolab Company
and/or Nalco Water,

Plaintiffs,

v.

ANTHONY RIDLEY and CHEMTREAT,
INC.,

Defendants.

No. 1:22-cv-00050-TRM-SKL

Hon. Travis McDonough

Magistrate Judge Susan K. Lee

PLAINTIFFS' DISCOVERY CERTIFICATION

Pursuant to the Court's April 14, 2023 (D.E. 212), Plaintiffs Ecolab Inc. ("Ecolab") and Nalco Company LLC d/b/a Nalco Water, an Ecolab Company and/or Nalco Water ("Nalco") (jointly referred to as "Nalco/Ecolab" or "Plaintiffs"), by and through their counsel, hereby certify that, following a reasonable and proportional search, Plaintiffs have produced all responsive, non-privileged documents that they agreed to produce in response to RFP Nos. 1-3, 7, 39-40, 43-44, 56-57, 66-68, 89-91. Plaintiffs further certify that, following a reasonable and proportional search, there are no documents responsive to RFP Nos. 8 and 9.

Pursuant to the Court's April 14, 2023 (D.E. 212), Plaintiffs certify that, following a reasonable and proportional search, they have produced all non-privileged, responsive documents that they agreed to produce in response to RFP Nos. 20-22 and 27. Plaintiffs further certify that they searched for and did not locate any other email exchanges similar to the one produced by Insight.

Pursuant to the Court's April 14, 2023 (D.E. 212), Plaintiffs certify that, following a reasonable and proportional search, they have produced all non-privileged, responsive documents that they agreed to produce in response to RFP No. 45. Plaintiffs further state that today they are producing documents reflecting the job descriptions for the last two positions held by Ridley when he was employed by Plaintiffs.

Pursuant to the Court's April 14, 2023 (D.E. 212), certify that, following a reasonably and proportional search, they have not identified any documents in their possession that are responsive to RFP No. 72. Plaintiffs further state that correspondence from Vidya Mirmira, Esq. is responsive to this RFP.

Pursuant to the Court's April 14, 2023 (D.E. 212), Plaintiffs certify that, following a reasonable and proportional search, they have produced all non-privileged, responsive documents that they agreed to produce in response to RFP Nos. 75-77. Plaintiffs further state that today they are producing documents reflecting the information sought with respect to his final position at Ecolab.

Respectfully submitted,

ECOLAB INC. NALCO COMPANY, LLC
d/b/a Nalco Water, an Ecolab Company
and/or Nalco Water,

By Counsel

By: /s/ Edward G. Winsman
J. Gregory Grisham (TN BPR#013810)
FISHER & PHILLIPS LLP
1715 Aaron Brenner Drive, Suite 312
Memphis, Tennessee 38120
Telephone: 901.526.0431
Fax: 901.526.8183
ggrisham@fisherphillips.com

Pavneet Singh Uppal
(*pro hac vice*)
FISHER & PHILLIPS LLP
3200 N. Central Avenue, Suite 1550
Phoenix, Arizona 85012-2487
Telephone: 602.281.3400
Fax: 602.281.3401
puppal@fisherphillips.com

David J. Walton (*pro hac vice*)
Edward G. Winsman (*pro hac vice*)
FISHER & PHILLIPS LLP
Two Logan Square, 12th Floor
100 N. 18th Street
Philadelphia, PA 19103
Telephone: 610.230.6015/2142
Fax: 610.230.2151
dwalton@fisherphillips.com
ewinsman@fisherphillips.com

COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was served via electronic mail on March 3, 2023, upon the following:

Vidya Atre Mirmira
Juli Ann Lund
Troy C. Homesley
WILLIAMS & CONNOLLY LLP
680 Maine Ave. SW
Washington, DC 20024
vmirmira@wc.com
jlund@wc.com
thomesley@wc.com

W. Scott Sims
Michael R. O'Neill
SIMS FUNK PLC
3322 West End Ave. #200
Nashville, TN 37203
ssims@simfunk.com
moneill@simsfunk.com

Attorneys for Defendant ChemTreat, Inc.

Lance W. Pope, BPR No. 025054
Jeremy M. Cothorn, BPR No. 027166
Patrick, Beard, Schulman & Jacoway, P.C.
537 Market Street, Suite 300
Chattanooga, TN 37402
lpope@pbsjlaw.com
jcothorn@pbsjlaw.com

Attorneys for Anthony Ridley

/s/ Edward G. Winsman

EXHIBIT “B”

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA DIVISION**

ECOLAB INC., and NALCO COMPANY,
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Plaintiffs,

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ANTHONY RIDLEY and CHEMTREAT,
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PLAINTIFFS' DISCOVERY CERTIFICATION

Pursuant to the Court's April 14, 2023 Order (D.E. 212), Plaintiffs Ecolab Inc. ("Ecolab") and Nalco Company LLC d/b/a Nalco Water, an Ecolab Company and/or Nalco Water ("Nalco") (jointly referred to as "Nalco/Ecolab" or "Plaintiffs"), by and through their counsel, hereby certify that, following a reasonable search, they have produced all non-privileged, responsive documents that they agreed to produce in response to RFP Nos. 48-53. Plaintiffs continue to search for one document referenced in the Court's Order ("DLP-Data Loss Prevention") and will produce that document promptly in the event that it is located.

With respect to RFP Nos. 78-82, Plaintiffs are not claiming damages for lost customers at this time. Rather, Plaintiffs are seeking recovery as set forth in the February 24, 2023 Expert Report of Dana Trexler. Plaintiffs certify that that have produced all documents relied upon by Ms. Trexler.

Respectfully submitted,

ECOLAB INC. NALCO COMPANY, LLC
d/b/a Nalco Water, an Ecolab Company
and/or Nalco Water,

By Counsel

By: /s/ Edward G. Winsman
J. Gregory Grisham (TN BPR#013810)
FISHER & PHILLIPS LLP
1715 Aaron Brenner Drive, Suite 312
Memphis, Tennessee 38120
Telephone: 901.526.0431
Fax: 901.526.8183
ggrisham@fisherphillips.com

Pavneet Singh Uppal
(*pro hac vice*)
FISHER & PHILLIPS LLP
3200 N. Central Avenue, Suite 1550
Phoenix, Arizona 85012-2487
Telephone: 602.281.3400
Fax: 602.281.3401
puppal@fisherphillips.com

David J. Walton (*pro hac vice*)
Edward G. Winsman (*pro hac vice*)
FISHER & PHILLIPS LLP
Two Logan Square, 12th Floor
100 N. 18th Street
Philadelphia, PA 19103
Telephone: 610.230.6015/2142
Fax: 610.230.2151
dwalton@fisherphillips.com
ewinsman@fisherphillips.com

COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was served via electronic mail on April 27, 2023, upon the following:

Vidya Atre Mirmira
Juli Ann Lund
Troy C. Homesley
WILLIAMS & CONNOLLY LLP
680 Maine Ave. SW
Washington, DC 20024
vmirmira@wc.com
jlund@wc.com
thomesley@wc.com

W. Scott Sims
Michael R. O'Neill
SIMS FUNK PLC
3322 West End Ave. #200
Nashville, TN 37203
ssims@simfunk.com
moneill@simsfunk.com

Attorneys for Defendant ChemTreat, Inc.

Lance W. Pope, BPR No. 025054
Jeremy M. Cothorn, BPR No. 027166
Patrick, Beard, Schulman & Jacoway, P.C.
537 Market Street, Suite 300
Chattanooga, TN 37402
lpope@pbsjlaw.com
jcothorn@pbsjlaw.com

Attorneys for Anthony Ridley

/s/ Edward G. Winsman

EXHIBIT “C”

VERIFICATION

I, Kerri Mallberg, declare as follows:

I have read Plaintiffs' April 19, 2023 Discovery Certification and Plaintiffs' April 27, 2023 Discovery Certification. I am authorized to make this verification on behalf of Plaintiffs, Ecolab Inc. and Nalco Company, LLC. To the extent I have personal knowledge of the matters set forth therein, the same are true and correct. Insofar as said matters are a composite of the information of multiple individuals, I do not have personal knowledge concerning all of the information contained in the above-mentioned document, but I am informed and believe that the information set forth therein for which I lack personal knowledge is true and correct.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 21st day of June 2023.

Kerri Mallberg
Kerri Mallberg
Law Manager